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Attorneys for Defendants

UBER TECHNOLOGIES, INC., RASIER, LLC,

And RASIER-CA, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC'S MOTION TO
QUASH ADDITIONAL DEPOSITION OF
HANNAH NILLES**

Judge: Hon. Charles R. Breyer

Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC in this action. I have personal knowledge of each
5 and all of the facts stated in this declaration and, if called as a witness, could and would competently
6 testify to the facts contained herein.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the transcript of the
8 deposition of Hannah Nilles, taken on August 7, 2025.

9 I declare under penalty of perjury under the laws of the United States and the State of California
10 that the foregoing is true and correct.

11 Executed on January 2, 2026, in San Francisco, California.

12 /s/ Laura Vartain Horn
13 Laura Vartain Horn
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